TRI-PARTY AGREEMENT

Change Notice Number TPA-CN- 621	TPA CHANGE NOTICE FORM	Date: 4/15/2014
Document Number, Title, and Revision: RPP-9937, Revision 3C, Single-Shell Tank System Leak Detection and Monitoring Functions and Requirements Document		Date Document Last Issued: 6/13/2013
Originator: J.M. Johnson		Phone: 376-1866

Description of Change:

Changes are proposed in the following subject areas: (1) revise tank monitoring and response requirements for declared intrusions, (2) revise requirements related to responses to leaks, (3) document retrieval completion of 241-C-110, and (4) to improve document consistency. Change form TPA-CN-576 (Administrative Record Accession #1306170036) approved changes to RPP-9937 Revision 3B. This TPA change notice form modifies Revision 3C and creates Revision 3D.

J.M.Johnson (DOE) and J.J.Lyon (Lead Regulatory Agency) agree that the proposed change modifies an approved workplan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, *Documentation and Records,* and not Chapter 12.0, *Changes to the Agreement.*

The description of changes is continued on next page.

DOE will submit draft revision 4 of RPP-9937 to Ecology for TPA primary document review no later than November 15, 2014.

Note: Include affected page number(s)

Justification and Impacts of Change:
The changes will modify requirements due to confirmed intrusions, correct inconsistencies, and will update the retrieval completion status of the single shell tank 241-C-110.

Approvals:

DOE Project Manager N/A	4/21/14 Date	[X] Approved [ ] Disapproved
EPA Project Manager	Date	[ ] Approved [ ] Disapproved
Jeffery J. Lyon Ecology Project Manager	4-16-14 Date	[X] Approved [ ] Disapproved

Description of Change (continued):

(1) Revise tank monitoring and response requirements for declared intrusions.

Basis for changing intrusion monitoring frequency from the current requirement of weekly to the new requirement of quarterly:
When an intrusion is identified, the current requirement to increase the monitoring frequency for tanks with a confirmed intrusion to weekly provides no added benefit. Intrusion rates from water in the soil, condensation, drainage from pits and connected trenches, or other unknown sources has been shown by experience to be in a nominal 0 to ~300 gallons/year range. Observing a ~75 gallons/year increase on a quarterly basis is possible when using an Enraf gauge on a liquid surface. Whether a ~75 gallons/year increase would be noted by Liquid Observation Well (LOW) monitoring is dependent upon how the Interstitial Liquid Level is interpreted. Trying to observe and confirm a ~6 gallons/week increase for either an Enraf (surface level gauge) or a LOW (Interstitial Liquid Level) measurement is not realistic nor would it provide any potential benefit from an environmental standpoint if such measurement were practical.

Table 1-1 is changed as follows:

- 241-A-102: Page 1-3, change "Annual" to "Quarter" and "4.1.1.A.1" to "4.1.1.A.3"
- 241-B-202: Page 1-6, change "Annual" to "Quarter" and "4.1.1.A.2" to "4.1.1.A.3"
- 241-BX-101: Page 1-4, change "Annual" to "Quarter" and "4.1.1.A.1" to "4.1.1.A.3"
- 241-BX-110: Page 1-4, change "Annual" to "Quarter" and "4.1.1.A.1" to "4.1.1.A.3"
- 241-BY-102: Page 1-10, change "Annual" to "Quarter" and "4.1.1.A.2" to "4.1.1.A.3"
- 241-SX-102: Page 1-7, "Annual" to "Quarter" and "4.1.1.A.2" to "4.1.1.A.3"
- 241-SX-106: Page 1-4, change "Annual" to "Quarter" and "4.1.1.A.1" to "4.1.1.A.3"
- 241-T-101: Page 1-5, change "Annual" to "Quarter" and "4.1.1.A.1" to "4.1.1.A.3"
- 241-T-111: Page 1-5, change "4.1.1.A.1" to "4.1.1.A.3"
- 241-U-111, Page 1-10, change "Annual" to "Quarter" and "4.1.1.A.2" to "4.1.1.A.3"
- 241-UX-302A: Page 1-11, change "4.1.1.B.1" to "4.1.1.B.2"

Section 4.1.1.A.3 is revised as follows:
Requirement: SSTs where LDM is technically feasible that do not meet interim stabilization criteria, do not have suspect integrity, and intrusion prevention has been completed, require quarterly LDM or intrusion monitoring. SSTs where LDM is technically feasible and meet the interim stabilization criteria with drainable interstitial liquid >40K gallons and intrusion prevention activity has not been completed shall require weekly LDM or intrusion monitoring (see Figure 4-2). Tanks in which intrusion is detected shall be monitored ~~weekly~~ quarterly. ~~The cause of the intrusion will be determined.~~ Ecology will be notified within 7-days after the intrusion ~~cause~~ has been ~~determined~~ detected and discussions will begin on the course of action to be taken. A decision on the course of action to be taken will be negotiated as part of the priorities under M-45-56, "Complete Implementation of to be taken Agreed-To Interim Measures." ~~stop the intrusion.~~ Liquid from intrusion will be removed during the waste retrieval of the effected tank.

Basis: Tanks that do not meet interim stabilization criteria require direct measurement of the liquid level for leak monitoring in accordance with WAC 173-303-400 and 40 CFR 265.193. Tanks that are not protected from intrusion must be monitored in accordance with. ~~See~~ Appendix B ~~for an expanded discussion of this basis~~.

The description of changes is continued on next page.

Description of Change (continued):

Section 4.1.1.B.2 is revised as follows:

Requirement: Inactive/not-in-use MUSTs that have not been stabilized and do not meet interim stabilization criteria shall require LDM. Mission essential MUSTs shall require LDM. Leak detection and monitoring systems shall have the ability to detect leaks at the earliest practicable time allowed by existing detection technology and existing MUST conditions (see Figure 4-3).

Basis: WAC 173-303-400; 40 CFR 265.193(c)(3). See Appendix B for an expanded discussion of this basis. There are no mission essential MUSTs. MUSTs (catch tanks, double-contained receiving tanks) where LDM is technically feasible that do not meet interim stabilization criteria, do not have suspect integrity, and intrusion prevention has been completed, require quarterly LDM or intrusion monitoring. MUSTs where LDM is technically feasible and meet the interim stabilization criteria, and intrusion prevention activity has not been completed shall require weekly LDM or intrusion monitoring. Tanks in which intrusion is detected shall be monitored ~~weekly~~ quarterly. ~~The cause of the intrusion will be determined~~. Ecology will be notified within 7-days after the intrusion ~~cause~~ has been ~~determined~~ detected and discussions will begin on the course of action to be taken. A decision on the course of action to be taken will be negotiated as part of the priorities under M-45-56, "Complete Implementation of to be taken Agreed-To Interim Measures."~~stop the intrusion.~~ Liquid from intrusion will be removed during the waste retrieval of the effected tank.

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Section 4.1.1.C.2 is revised as follows:

Requirement: Inactive/not-in-use vessels and cells in miscellaneous structures that do not meet interim stabilization criteria require LDM. Mission essential vessels and cells in miscellaneous structures require LDM. Leak detection and monitoring systems shall have the ability to detect leaks at the earliest practicable time allowed by existing detection technology and existing vessel and cell conditions (see Figure 4 4).

Basis: WAC 173-303-400; 40 CFR 265.193(c)(3). See Appendix B for an expanded discussion of this basis. Inactive vessels and cells in miscellaneous structures where LDM is technically feasible that do not meet interim stabilization criteria and intrusion prevention has been completed, require quarterly LDM or intrusion monitoring. Inactive vessels and cells in miscellaneous structures where LDM is technically feasible and meet the interim stabilization criteria and intrusion prevention activity has not been completed shall require weekly LDM or intrusion monitoring. Tanks in which intrusion is detected shall be monitored ~~weekly~~ quarterly. ~~The cause of the intrusion will be determined~~. Ecology will be notified within 7-days after the intrusion ~~cause~~ has been ~~determined~~ detected and discussions will begin on the course of action to be taken. A decision on the course of action to be taken will be negotiated as part of the priorities under M-45-56, "Complete Implementation of to be taken Agreed-To Interim Measures."~~stop the intrusion.~~ Liquid from intrusion will be removed during the waste retrieval of the effected tank.

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The description of changes is continued on next page.

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Date Document Last Issued:
6/13/2013

Description of Change (continued):

Section 5.2.1 3rd paragraph is revised as follows:
The second group of SSTs includes tanks that are technically feasible to LDM, meet interim stabilization criteria and have not had intrusion prevention activity completed or do not meet interim stabilization criteria, do not have suspect integrity, and have completed intrusion prevention. As a BMP, the tanks that meet interim stabilization criteria and do not have completed intrusion prevention are monitored at least weekly for liquid intrusions using currently available monitoring systems. The tanks that do not meet interim stabilization criteria, have completed intrusion prevention, and do not have suspect integrity are monitored at least quarterly. Tanks in which intrusion is detected shall be monitored ~~weekly~~ quarterly. ~~The cause of the intrusion will be determined.~~ Ecology will be notified within 7-days after the intrusion ~~cause~~ has been ~~determined~~ detected and discussions will begin on the course of action to be taken. A decision on the course of action to be taken will be negotiated as part of the priorities under M-45-56, "Complete Implementation of to be taken Agreed-To Interim Measures."~~stop the intrusion.~~ Liquid from intrusion will be removed during the waste retrieval of the effected tank. (Refer to Table B-4)

Table B-1 is revised as follows:

- 241-BX-101: Page B-8, change "ENRAF used for intrusion only" to "ENRAF used for LDM and intrusion monitoring"
- 241-BX-103: Page B-8, change "ENRAF used for LDM" to "ENRAF used for LDM and intrusion monitoring"

Table B-2 is revised as follows:

- Page B-14, Row for 4.1.1(A)(3)
  SSTs where LDM is technically feasible that do not meet interim stabilization criteria do not have suspect integrity, and have intrusion prevention completed shall be monitored quarterly. SSTs that meet the interim stabilization criteria with drainable interstitial liquid >40K gallons and intrusion prevention activity has been completed shall require quarterly LDM. SSTs that do not meet these criteria shall be monitored weekly. Tanks in which intrusion is detected shall be monitored ~~weekly~~ quarterly. ~~The cause of the intrusion will be determined~~. Ecology will be notified within 7-days after the intrusion ~~cause~~ has been ~~determined~~ detected and discussions will begin on the course of ~~and~~ action to be taken. A decision on the course of action to be taken will be negotiated as part of the priorities under M-45-56, "Complete Implementation of Agreed-To Interim Measures."~~stop the intrusion.~~ Liquid from intrusion will be removed during the waste retrieval of the effected tank.

The description of changes is continued on next page.

Description of Change (continued):

(2) Revise requirements related to responses to leaks

Basis for change: Change reflects SST tanks have all been removed from service and therefore not needed as a response element.

Section 4.1.3.A.3 is revised as follows:

Requirement: SSTs that do not meet interim stabilization criteria require the following responses to leaks: (a) ~~Remove the tank from service; (b)~~ Immediately contain and inspect visible releases to the environment from tank systems; (b) ~~(c)~~ Report leaks to Ecology within 24 hours of their detection unless the hazardous waste leak or spill involves 1 pound or less of material immediately contained and cleaned up; and (c) ~~(e)~~ File a report with Ecology within 30 days.

Basis: WAC 173-303-400; 40 CFR 265.196. Tanks that do not meet interim stabilization criteria require installation and operation of the emergency pumping system as soon as practicable upon detecting a leak in accordance with the emergency pumping plan. See Appendix B for an expanded discussion of this basis.

(3) Document retrieval completion of 241-C-110

Basis: Retrieval was completed and documented in the ORP letter to Ecology dated January 29, 2014 (Administrative Record Accession #0086546).

- Page B-9 Row for C-110, change "ENRAF used for intrusion only" to "Waste retrieval has been completed. ENRAF used for intrusion only."

(4) Improve document consistency

Basis: Changes to remove duplicate information will improve document consistency.

The following changes to Table 1-1 are made:

- Reorder list of tanks into alpha-numerical order and only include one entry per tank in the table (most conservative monitoring frequency).
- Change column header from "Interim Stabilized?" to "Meets Interim Stabilization Criteria?"
- Add section divider rows in table for "100/200 Series Tanks" and "Other Tanks."
- Add Note 9 to Table 1-1 that reads: "In the event Table 1-1 and the Appendices conflict, Table 1-1 will be used for interpretation of requirements."
- Page 1-3, 2nd Row for 241-A-103, delete extra row for this tank.
- Page 1-5, change Monitoring Frequency for T-111 from "Annual" to "Monthly".

The description of changes is continued on next page.

Description of Change (continued):

Changes to Table 1-1 con't:

- Page 1-6, 2nd Row for 241-BY-103, delete extra row for this tank.
- Page 1-9, 2nd Row for 241-BX-103, delete extra row for this tank.
- Page 1-9, 2nd Row for 241-T-102, delete extra row for this tank.
- Page 1-9, 2nd Row for 241-T-112, delete extra row for this tank.
- Page 1-10, 2nd Row for 241-S-111, delete extra row for this tank.
- Add new row to table for 241-BY-107 with columns consisting of "SST", "Yes", "BMP", "Annual", "N/A", "4.1.1.A.1."

Table B-1 is revised as follows:

241-A-103: Page B-7, change "LOW used for LDM" to "ENRAF or LOW used for LDM"

Basis: A liquid surface exists in this tank.